

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Cr. No. 11-10212-JLT
)	
2. BRANT WELTY,)	
7. MICHAEL CLEMENTE,)	
a/k/a "Ricky Martin,")	
9. MARK THOMPSON,)	
12. BRIDGET WELTY, and)	
14. COLBY DEERING,)	
)	
Defendants.)	

GOVERNMENT'S PRELIMINARY EXHIBIT LIST

The United States of America intends to offer the following exhibits at trial. The government will number its final version of the list. The government reserves its right to supplement and modify the list with reasonable notice to the defendants.

<u>Exhibit No.</u>	<u>Exhibit</u>
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CRU Corporate and Licensing Documents

Western Union Money Transfers dated June 26, 2010

Photograph of and Documents Concerning Purchase of Bentley Continental on June 29, 2010

Photographs of and Documents Concerning Lease of 2109 NE 18th Avenue, Wilton Manors, FL

Documents Concerning Delinquency and Collection for 2109 NE 18th Avenue rental

Receipt for Room Rental, Ramada Boston, October 23, 2010

Surveillance Photographs, November 29 and December 1, 2010

Photographs of Money Seized from Brian Bowes
on December 1, 2010

Surveillance Photographs, January 6, 2011

Articles of Incorporation, Mike's Boat and
Jet Ski Rentals, Inc.

Deposit Ticket, Receipt, Debit and Cashier's
Check, January 7, 2011

Photographs of and Documents Concerning
Purchase of Baja '38 Special Boat, January 8,
2011

Photographs of Drugs Delivered by Michael
Shaw, January 15, 2011

Mercantile Bank Deposit Ticket, Receipt, and
Cashier's Check, dated January 15, 2011, and
Cru Wine & Spirits, Inc., Account Statements
and Documents

Citizens Bank Deposit Ticket, Receipt,
Withdrawal and Cashier's Check, dated January
15, 2011, and Bridget Welty Account
Statements and Documents

Handwritten Note with GreenDot Confirmation
Numbers

JetBlue Passenger Receipt dated January 18,
2011

Walgreen's Receipt dated January 18, 2011

Oxycodone Seized on January 18, 2011

Drug Certification for Oxycodone Seized on
January 18, 2011, and Chemist's CV

Jewelry Appraisals dated January 24, 2011

AAAbbott & Cathy Bail Bonds Documents dated
January 25, 2011

A Signature Only Bail Bonds Documents dated
January 25, 2011

Photograph of and Documents Concerning
Purchase of Mercedes-Benz SL550 on January
18, 2011

JetBlue Boarding Pass dated February 4, 2011

Articles of Incorporation, 9Five4 Nightclub
Group, Inc.

Photograph of and Receipt for Downpayment on
Rolls Royce dated February 5, 2011

Euro Motor Sport, Inc., Check dated February
16, 2011

Photographs of Money Seized on February 10,
2011, Ridgeland, South Carolina

Photograph of and Asset Purchase Agreement
dated February 18, 2011, for Sky Club

Receipt for Car Rental, Hertz, Fayetteville,
North Carolina, February 21, 2011

Photographs of and Documents Concerning
Purchase of Porsche Cayenne, February 24,
2011

Photographs of and Documents Concerning Lease
of 2940 NE 23rd Court, Pompano Beach, Florida

Oxycodone Seized on March 22, 2011

Drug Certification for Oxycodone Seized on
March 22, 2011, and Chemist's CV

Video of Traffic Stop and Money Seizure in
Dillon, South Carolina, March 24, 2011

Documents Concerning and Deposit Receipts to
9Five4 Nightclub Group, Inc., Business
Account at Citibank, Opened March 29, 2011

Check dated April 6, 2011, Withdrawal Receipt
dated April 7, 2011, from Conceicao D.
Rodrigues Bank of America Account

Brant Welty Bank of America Account

Statements and Documents

Receipt for Car Rental, Avis, Ft. Lauderdale, FL, returned May 7, 2011

Check In and Statement, Hampton Inn, Warwick Rhode Island, May 11, 2011

Photographs of and Documents Recovered in Search of 2940 NE 23rd Court, Pompano Beach, Florida, on May 27, 2011

Items Seized during Search of 2940 NE 23rd Court, Pompano Beach, Florida, on May 27, 2011 (to be listed), including money counters, marijuana paraphernalia, Sig Sauer P226 .40 caliber pistol and magazines

Documents Recovered in Search of 2705 NE 9th Avenue, Apartment 102, Wilton Manors, Florida, on May 27, 2011

Photographs of and Documents Recovered in Search of 21 Wormwood Street, #214, Boston, Massachusetts, on May 27, 2011

Items Seized during Search of 21 Wormwood Street, #214, Boston, Massachusetts, on May 27, 2011 (to be listed), including:

Firearms and Firearm Magazines Seized during Search of 21 Wormwood Street, #214, Boston, Massachusetts, on May 27, 2011 (to be listed), including: Glock 19 pistol with magazines, Sig Sauer SP 2340 pistol with magazines, Smith and Wesson .38 caliber handgun, two (2) Smith and Wesson .357 magnum handguns, Smith and Wesson .40 caliber pistol with magazines, Interarms Walther .380 caliber pistol, Colt Diamondback .38 caliber pistol, Remington 870 Magnum 12 gauge shotgun, LW Seacamp .32 caliber pistol, Panther Arms A-15 rifle with magazine, Uzi Model B 9 mm. rifle with magazines, bag and barrel

Body Armor Seized during Search of 21 Wormwood Street, #214, Boston, Massachusetts,

on May 27, 2011

Photographs of and Documents Recovered in Search of Cru Wine & Spirits, Inc., 1750-1752 Massachusetts Avenue, Boston, Massachusetts, on May 27, 2011

Items Seized during Search of Cru Wine & Spirits, Inc., 1750-1752 Massachusetts Avenue, Boston, Massachusetts, on May 27, 2011 (to be listed), including licenses and permits

Photographs of and Documents Recovered in Search of 225 Neponset Avenue, #2, Boston, Massachusetts, on May 27, 2011

Items Seized during Search of 225 Neponset Avenue, #2, Boston, Massachusetts, on May 27, 2011 (to be listed), including: Foodsaver vacuum sealing bags, money wrappers, Seal-a-Meal Sealer

Photographs of and Documents Recovered in Search of 13 Park Street, #9, Boston, Massachusetts, on May 27, 2011

Items Seized during Search of 13 Park Street, #9, Boston, Massachusetts, on May 27, 2011 (to be listed), including money counter, rolls of heat sealer bags, Seal-a-Meal Sealer

Photographs of Pertinent Locations, including:

1. 2109 NE 18th Ave., Wilton Manors, FL
2. 2940 NE 23rd Court, Pompano Beach, FL
3. Brian Bowes' residence, Sunrise, FL
4. Oakland Park apartments of Ashlyanna Ore (formerly Ashley Napoles)
5. 13 Park street, #9, Dorchester
6. 21 Wormwood street, # 214, South Boston, MA
7. Cru Wine & Spirits, 1750-1752 Washington Street, Boston, MA.
8. Sky Club, Fort Lauderdale, FL
9. Citibank Building, Fort Lauderdale, FL
9. Colby Deering's residences in Quincy, MA

10. Boomer Traffic Jams, Columbia Road,
Dorchester, MA

Photographs of Individuals, including:

John Willis
Brant Welty
Peter Melendez
Brian Bowes
Kevin Baranowski
Michael Clemente
Michael Shaw
Mark Thompson
Steven Le
Vincent Alberico
Bridget Welty
Anevay Duffy
Colby Deering
Anh Nguyen
Tamer Awad
Brian Garneau
Hanna Le
Christine White
Jason Boyd
Steven Davis
Craig Young
Kelly Lacerda
Ashley Ann Ore

Photographs of Seized Vehicles, Motorcycles,
and Watercraft (to be listed)

Telephone Calls Intercepted Over Telephone
No. 617-800-6110 (Target Telephone 2), listed
by Session No.:

248
380
481
538
546
773
905

Telephone Calls Intercepted Over Telephone
No. 857-318-9387 (Target Telephone 4), listed
by Session No.:

6
21

22
24
95
104
105
126
168
179
192
199
219
247
249
258
312
313
314
317
326
339
340
355
359
363
364
372
384
385
406
426
452
461
462
474
485
508
512
515
517
586
589
596
597
600
612
653
659
662

681
694
744
782
873
1077
1136
1145
1307
1315
1319
1339
1377
1412
1415
1428
1430
1454
1488
1688
1759
1783
1810
1816
1827
1828
1832
1837
1847
1875
1966
1971
2028
2077
2085
2089
2119
2220
2237
2256
2271
2317
2333
2356
2357
2422
2432
2625

1830

Telephone Calls Intercepted Over Telephone
No. 857-253-1402 (Target Telephone 8), listed
by Session No.:

2
9
21
25
52
61
68
72
77
78
80
82
83
103
112

Transcripts of Intercepted Calls

Records produced by Green Dot

Records produced by JetBlue

Records produced by TransUnion Regarding
Defendants Brant Welty and Bridget Welty

Internal Revenue Service Tax Returns and
Return Information, and Certifications of
Lack of Record as to pertinent individuals
and entities, including John Willis, Brant
Welty, Bridget Welty, Mark Thompson, Michael
Clemente, Colby Deering, Michael Shaw, Cru
Wine & Spirits, Inc., 9Five4 Nightclub Group,
Inc., and Mike's Boat & Jet Ski Rentals, Inc.

Plea Agreements for Cooperating Defendants

Immunity Agreements for Immunized Witnesses

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/Richard L. Hoffman
RICHARD L. HOFFMAN
TIMOTHY E. MORAN
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

By: /s/Richard L. Hoffman
Richard L. Hoffman
Assistant U.S. Attorney

Dated: March 14, 2013